

SCHOLASTIC PRODUCT SAFETY PROTOCOL

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SCHOLASTIC'S PRODUCT SAFETY PROTOCOL

2018

A copy of this Scholastic Product Safety Protocol, together with a letter confirming your agreement to comply with this Protocol, is being supplied for your review and signature. Please make sure you have reviewed, in its entirety, the Scholastic Product Safety Protocol and the accompanying letter of agreement. Please sign and date the letter where indicated to confirm your agreement with the letter and compliance with the Protocol and return the signed letter to Karen Fuchs, Director, Product Safety, Scholastic Inc.

ALL ITEMS PURCHASED BY SCHOLASTIC INC. MUST COMPLY WITH ALL APPLICABLE LAWS AND REGULATIONS AND ARE SUBJECT TO THE SCHOLASTIC PRODUCT SAFETY PROTOCOL AS SET FORTH HEREIN. FURTHER, NO SCHOLASTIC EMPLOYEE OR ANY OF ITS CLIENTS, CUSTOMERS, VENDORS, OR THEIR SUPPLIERS WILL ACT IN ANY WAY THAT CREATES UNDUE INFLUENCE ON ANY TESTING LAB TO SUPPLY FALSE TEST RESULTS AND/OR FALSE REPORTS.

The Consumer Product Safety Improvement Act (CPSIA) has been in effect since November 2008 and covers safety compliance requirements for children's products, including but not limited to toys. Children's products are designed or intended primarily for children 12 years of age or younger. To safeguard the quality of all products manufactured or purchased by Scholastic, we require that all products meet all Federal, State, and Local U.S. laws and regulations, as well as those of any country outside the U.S., as needed. **It is the vendors' responsibility to be aware of and to meet all legal requirements and to comply with Scholastic's Product Safety Compliance Protocol (the "Protocol") regarding materials sourced, 3rd party testing, and certifications prior to shipping any order.**

Please read this document carefully. Scholastic requires that you sign, date and return the letter provided acknowledging that you will comply with the requirements in the Protocol. Any questions or concerns with the Protocol can be addressed, in writing, to ProductSafety@scholastic.com.

1. **SCHOLASTIC COMPLIANCE REQUIREMENT HIGHLIGHTS:** All products manufactured for or sold to Scholastic must comply with all applicable regulations for that product, the country standards identified by Scholastic, and Scholastic's Protocol. Those requirements include but are not limited to, the following:
 - a. **LEAD:** Above and beyond federal requirements, Scholastic requires that all of its children's products meet a total lead in surface coating limit of less than 40 ppm.
 - b. **CADMIUM:** Above and beyond federal requirements, Scholastic requires a total cadmium limit (surface coating and accessible substrate) of 40 ppm on any plastic and metal children's jewelry, and any plastic or metal that is a small part, for children under 15 years of age.
 - c. **BANNED SUBSTANCES FOR SCHOLASTIC PRODUCTS: BISPHENOL A (BPA), TCEP and BORIC ACID/BORAX POWDER:**
 - i. **BISPHENOL A (BPA):** Scholastic bans the use of Bisphenol A (BPA) in the manufacture of any food or beverage containers and on any items meant to be placed in the mouth, and intended for use by and/or for the care of children under 3 years of age.
 - ii. **TCEP:** Scholastic also bans the use of TCEP in any polyurethane foam used, in whole or in part, in products intended for children 3 years old and under.
 - iii. **BORIC ACID/BORAX POWDER:** Scholastic bans the use of boric acid/borax powder in its arts and crafts kits due to concerns that it is highly alkaline and can be an eye, nose and respiratory tract irritant.
 - d. **CALIFORNIA PROPOSITION 65:** any products manufactured for or purchased by Scholastic, must not contain a Prop 65 chemical that would necessitate a Prop 65 Warning for California. The most current list of California's Prop 65 chemicals is available at <https://oehha.ca.gov/proposition-65/proposition-65-list>.
 - e. **BILLS OF SUBSTANCES:**
 - i. A Bill of Substance ("BOS") form must be made available upon request by Scholastic and sent to ProductSafety@Scholastic.com. See exhibit A for sample form.
 - f. **CHEMICALS OF HIGH CONCERN DECLARATION:**
 - i. **Scholastic Manufacture Vendors:** Prior to manufacturing any product for Scholastic, vendors must submit a Chemicals of High Concern Declaration (CHCCD) stating that none of the products will contain any chemicals of high concern (CHCC). See exhibit B for sample form. Forms must be submitted for review and approval to ProductSafety@Scholastic.com.
 - ii. **Outside Purchase Vendors/Sellers:** Prior to shipping any finished products purchased by Scholastic from a Seller, that Seller must submit a CHCCD stating that there are no reportable levels of CHCC in their product. See exhibit B for sample form or provide your own if it provides the same information. If any CHCC are present and reportable at the Federal, state, and/or International level, they must be declared and the Seller must confirm that they have met the reporting obligation for that product. Forms must be submitted for review and approval to ProductSafety@Scholastic.com.
 - iii. A Declaration for re-orders is not required unless there is a material change between the previous order and the newest order. If there is a material change a new CHCCD will need to be provided.
 - g. **REPORTABLE REGULATIONS** – in addition to the obligations under Prop 65 labeling requirements, vendors must be aware of and comply, including filing all required reports, with all other applicable state laws and regulations, including but not limited to:
 - i. **Washington Children's Safe Products Act** creates a reporting requirement to the Washington State Department of Ecology ("DOE") for certain children's products containing Chemicals of High Concern for Children ("CHCC"). The list of CHCCs is available at <http://www.ecy.wa.gov/programs/hwtr/RTT/cspa/index.html>. Manufacturers of children's products must report to DOE if a children's product: (1) contains any of the CHCCs as an intentionally added component; OR (2) contains any of the CHCCs as a contaminant present above 100 ppm.

- The manufacturer or marketer of the children's product with a US presence is responsible for the reporting.
- ii. Vermont's Chemical Disclosure Program provides the requirements for the disclosure and reporting of toxic substances, designated by the State of Vermont to be chemicals of high concern, that are intentionally added to a children's product at a level above the practical quantification limit (PQL) or are present in a children's product produced by the manufacturer as a contaminant at concentrations of 100 parts per million (ppm) or greater. This applies to products offered for sale in Vermont, including internet sales. Vendor must file all applicable reports to the Vermont Department of Health. Forms and the current priority chemical list may be found at <http://www.healthvermont.gov/environment/children/chemical-disclosure-program-childrens-products-manufacturers>
 - iii. Maine's Regulation of Chemical Use sets forth the process by which manufacturers selling certain categories of products in Maine containing any of Maine's priority chemicals, in an amount greater than a de minimis amount, and who have not already reported to the Maine Department of Environmental Protection, must do so within 30 days of the product's availability in Maine. Forms and current priority chemical list may be found here <http://www.maine.gov/dep/safechem/forms.html>
 - iv. Oregon Toxic Free Kids Act requires manufacturers to report products to the state that contain chemicals identified as chemicals of high concern at greater than de minimis levels. Detailed information can be found at <https://www.oregon.gov/oha/PH/HEALTHYENVIRONMENTS/HEALTHYNEIGHBORHOODS/TOXICSUBSTANCES/Pages/Toxic-Free-Kids.aspx>
 - v. REACH Substances of Very High Concern (SVHC) requires that manufacturers notify the European Chemical Agency (ECHA) if any SVHC on the candidate list is present in their product above 0.1% (w/w). The current candidate list can be found at <https://echa.europa.eu/web/guest/candidate-list-table>
- h. TOXICS IN PACKAGING: Scholastic requires all vendors to submit a Statement of Compliance with Reduction of Toxics in Packaging letter. **See exhibit C for sample form**, to be submitted annually or when there is a change in regulations noted on the form.
 - i. DEHUMIDIFICATION AND MOLD PREVENTION POLICY: Vendors and factories must have a written policy in place, available on request.
 - j. TRACKING NUMBERS AND DATE CODING: Tracking numbers are a CPSIA requirement for all children's product packaging and, where feasible and applicable, the product itself.
 - i. Scholastic utilizes print lines on conventional books and PO# with mo/yr of manufacture for products that don't include a print line.
 - ii. Scholastic will accept alternative codes used by other manufacturers as long as they comply with CPSIA.
 - iii. Tracking numbers must be complete, permanent, and legible.
 - iv. Tracking numbers are required on all master cartons as well. They must be on at least two sides of the carton (not including top or bottom). The minimum size of the letter/numbers in the code is 0.5".
 - k. STUFFED ARTICLES AND TOYS
 - i. United States: All plush vendors that manufacture or provide stuffed toys and children's products to Scholastic must have a valid PA registration # that will appear on the Sewn in Label (SIL) of the product.
 - ii. Canada: All domestic and foreign manufacturers who manufacture or sell upholstered and stuffed articles to Scholastic, for sale in Canada, must have a valid Ontario registration number that appears on the product or product SIL. Please refer to the Upholstered and Stuffed Articles Regulation 218/01 of Ontario for details.
 - iii. All vendors that manufacture or sell stuffed articles or toys to Scholastic must have a needle retention policy in place to insure no needles or broken pieces of needles can be left unknowingly inside a stuffed article or toy. That policy must be made available to Scholastic upon request.
 - l. BATTERIES:
 - i. Follow all applicable requirements, including but not limited to labeling of button cell batteries.
 - ii. Battery compartments must be secured with a non-detachable screw, requiring a tool, like a coin or screwdriver, to unscrew it. The screw must remain attached to the lid of the compartment when opened.
 - iii. Products which include batteries that would run without a disruption of the connection must have a tab inserted between the battery and the connection when packaged. This tab must be removed to activate the battery power and turn on the device. The tab must include words to the

- effect “Remove and discard” and instructions for removal of the tab to activate battery power should be part of the battery instructions.
- iv. Batteries are to be date coded by the battery manufacturer to identify manufactured lots, and to track shelf life.
- v. Battery type, date codes, and shelf life will need to be stamped on the outside of shipping cartons. If the shipping carton contains batteries with different date codes, the earliest dated battery should be referenced on the carton.
- vi. Use alkaline manganese button cell batteries over lithium when possible.
- vii. Battery instructions must be provided in English and French
- m. **CORRECTIVE LABELING:** If re-labeling or “labeling over” is required on a given product or package (for example, to correct an incorrect age grade), the following conditions must all be met before that product will be accepted for shipment:
 - i. The label must be permanent. The lab considers a label permanent if, when peeled from the package, the substrate or the layer below will be removed with the label, destroying any old labeling.
 - ii. The label must be put on the package itself and not the over wrap. Over wrap is removable, revealing the old label.
 - iii. When a retest is necessary solely to verify new labeling, one relabeled package with a completed Scholastic Test Request Form (TRF) is required for testing. Also required is a statement on company letterhead, signed by an authorized officer of the company, stating that all pieces shipped will be so labeled.
 - iv. We will not accept “labeling over” of non-toxic claims.
- n. **CONVENTIONAL BOOKS AND PRINT MATERIALS:**
 - i. H.R. 2715 exempts conventional books and print materials from 3rd party testing requirements under CPSIA. Products must still comply but can do so based on a reasonable testing program using reports based on components or raw materials. No COC is required if 3rd party testing is not required.
 - ii. Exceptions to the H.R. 2715 are if the item has inherent play value or is intended for children under 3 years of age. Scholastic requires 3rd party testing and a COC for products covered by either of these exceptions.
 - iii. See decision tree (**Exhibit D**) regarding Scholastic’s compliance to H.R. 2715. This decision tree was created by industry input and consensus agreement by members of the print and publishing industries through the AAP, Association of American Publishers.
 - iv. In Canada books are not considered toys and are exempt from 3rd party testing under CCPSA (Canada Consumer Product Safety Act); however, books must be tested if stickers are bound in or if plastics are used as an embellishment in the manufacturing process of a book which includes plastic binding, lenticular printing or printing on multi-dimensional plastic.

2. SCHOLASTIC PRODUCT SAFETY STANDARD OPERATING PROCEDURE

- a. **TESTING:**
 - i. Vendors manufacturing children’s products for Scholastic will submit finished production samples, with a Scholastic supplied TRF, to our designated lab. Scholastic will have samples tested to ensure they comply with all applicable test standards and, upon completion, issue a Certificate of Compliance to the vendor. For finished products purchased by Scholastic from a Seller, Seller is responsible for doing all applicable testing and providing Scholastic a Certificate of Compliance prior to manufacturing or shipping of any order.
 - ii. Testing of products manufactured by Scholastic is conducted at a Scholastic approved lab to the Scholastic test protocol developed in partnership with our testing lab, available upon request. Notwithstanding the Scholastic test protocol. Vendor remains liable for requiring the lab to conduct all applicable safety tests, including any applicable safety tests that may not be included in the Scholastic test protocol.
 - iii. All purchase orders issued by Scholastic will identify “New Test Required” or “NCMP LOA required”.
 - 1. New Test Required: Any purchase order flagged as new test required must have production samples from that order submitted to a testing lab so that Scholastic receives a passing test report and can issue a Certificate of Compliance prior to that order being allowed to ship.
 - 2. NCMP LOA: No Change in the Manufacturing Process Letter of Assurance. It confirms that there has been no change in the manufacturing process since the previously tested order. If there has been a material change, that must be declared and new testing on the current order will be required. **See exhibit E for sample form.** Scholastic accepts this

- LOA, if there is no material change, in lieu of 3rd party testing a new order if an existing test report is on hand and less than 12 months old.
- iv. Process for submitting Scholastic manufactured products for testing:
 1. Scholastic will issue a TRF to the vendor identifying product, test lab, sample and test requirements. Vendor will send representative samples from the production run, with a copy of the TRF, to the lab designated on the TRF. **See exhibit F for sample form.**
 2. Scholastic will receive and maintain all test records
 3. Upon receipt of a passing test report, Scholastic, as importer of record, will issue a Certificate of Compliance (COC) to the vendor.
 4. No order may ship until a Certificate of Compliance (COC) has been issued to the vendor. **See exhibit G for sample certificate.**
 - v. Requirements for products Scholastic purchases from Outside packagers/Sellers: For outside purchases where vendors or packagers are selling their own finished product to Scholastic a CPSIA compliant Certificate of Compliance (COC) for children's products is required. A General Conformity Certificate (GCC) is required for general consumer goods. COC's must be based on testing at a CPSC accredited 3rd party testing lab to all applicable standards. Those reports must be less than 12 months old unless otherwise agreed to by Scholastic.
 - vi. **Where testing and certification is applicable, no order may ship until testing is complete and a certificate has been issued.**
- b. CERTIFICATE OF COMPLIANCE (COC) OR GENERAL CONFORMITY CERTIFICATE (GCC):
- i. A Certificate of Compliance (COC) is required for any children's product where 3rd party testing at a CPSC accredited lab is required. A General Conformity Certificate (GCC) would be for general consumer goods.
 - ii. Vendors of products that require 3rd party testing and where Scholastic is the importer, must submit finished components or final product samples to the lab for testing, as set forth above. A test report evidencing compliance with all applicable laws and regulations and this Protocol is required 30 days prior to bulk product shipping, unless otherwise agreed to in writing by Scholastic. Based on a final passing test report, Scholastic, as the importer, will issue a COC for the product at least 7 days prior to the item's requested ship date. Scholastic will maintain certificate copies in its database per CPSIA requirements.
 - iii. Products requiring 3rd party testing that are supplied by either a domestic vendor or imported by an overseas vendor will require that vendor to submit a COC to ProductSafety@scholastic.com at least 7 days prior to the item's requested ship date. It must be based on a pass test report issued by a 3rd party CPSC accredited testing lab and that report must be made available to Scholastic upon request.
 - iv. Scholastic's certificate database can be accessed by going to <http://coc.scholastic.com> and registering for a username and password. Once assigned, existing certificates are searchable and new certificates may be created or uploaded by users where applicable
- c. REORDER TESTING:
- i. Scholastic Manufacture vendors:
 1. Any re-order issued with "New Test Required" will require the vendor to request from Scholastic a TRF by sending a Submittal Request Form (SubR) to ProductSafety@Scholastic.com. **See exhibit H for sample form.** Upon receipt of a SubR form, Scholastic will issue the vendor a TRF to be submitted with production samples from the new order to the testing lab identified on the TRF. Scholastic will issue a COC upon receipt from the lab of a pass test report.
 2. Any re-order issued with "NCMP LOA Required" requires the vendor to submit a completed NCMP LOA to ProductSafety@scholastic.com. If there has been a material change since the previously tested order, a new test will be required. If there has been no material change, Scholastic will issue a COC to the vendor.
 - ii. Outside packager/Seller: Any re-order issued for outside purchases where vendors or packagers are selling their own finished product to Scholastic, a COC for a children's product or GCC for a general consumer good is required. A COC must be issued against a test report less than 12 months old, unless otherwise agreed to by Scholastic. Certificate must be submitted to ProductSafety@scholastic.com.
 - iii. **The vendor is responsible for making sure they look at safety status on all P.O.'s they receive and provide the necessary documents prior to any order shipping.**
 - iv. **Any material change declaration must be accompanied by an updated CHCC Declaration.**
- d. GROUP TESTING/PARTIAL TESTING: Similar items may be tested in groups (test one product type and apply the test result to all others) provided they satisfy the following conditions:
- i. The selected test item(s) has the same material make-up as the rest of the applicable items,

- ii. The selected test item(s) has the same production process as the rest of the applicable items,
 - iii. The selected test items(s) are manufactured in the same factory, and
 - iv. Are pre-approved by Scholastic for group testing.
- e. COMPONENT TESTING: Scholastic allows for component testing of production sample completed in advance of final collation. Where applicable, final production components that are tested in advance will not be part of testing the final kit. Existing results from the component testing will be merged into the final report.
- f. SAMPLE SUBMISSIONS TESTING LAB:
 - i. A copy of the TRF with the tracking number of the sample package must be emailed to the "Safety contacts" identified on the TRF.
 - ii. Upon receipt of samples the lab will provide a quote to Scholastic for approval and confirm if any additional samples or materials are needed above and beyond the initial 12 sent. Scholastic will request any additional samples needed from the vendor and they will need to be sent ASAP to avoid as much delay in the schedule as possible.
 - iii. Samples must be delivered to the lab with sufficient time for the lab to complete testing and issue a final report 30 days prior to the bulk order requested ship date unless otherwise agreed to by Scholastic.
 - iv. The lab cannot initiate testing until all required samples and paperwork are received. Delays caused by not following the sample submission procedures may result in missed ship dates. **It is the vendor's responsibility to meet ship dates.**
- g. NOTIFICATIONS:
 - i. Scholastic has automated testing reminder notifications. Reminders go out to vendors with open orders that are 4 weeks out from the requested ship date and again when they are 2 weeks out from their requested ship date. These reminders are meant to act as a helping tool for vendors so that any necessary test reports or COC/GCC's can be collected/submitted in a timely manner. These are reminders for products where testing is applicable.
 - ii. If open orders are for products that do not require testing nothing needs to be tested or submitted. An example would be conventional book and paper print products as outlined and exempted under H.R. 2715.
 - iii. The reminder notifications are a courtesy service to our vendors and **vendors remain solely liable for compliance with the testing and safety requirements set forth herein.**
 - iv. Any questions or concerns about whether a test report(s) or COC/GCC is required for an open order should immediately be addressed with Scholastic when order is placed or at minimum after the first notification is received.
- h. SAMPLE SELECTION:
 - i. Unless otherwise agreed to by Scholastic, samples will be pulled randomly by the vendor and sent to the testing lab. Samples must be representative of the full production run and cannot be "gold samples". A golden sample is a sample produced by a manufacturer that is perfect in almost all ways, so that when evaluated (by clients, competitors, inspectors, media, etc.) it can be tested and receive a high standard review but does not represent the actual bulk of production.
 - ii. For runs equal to or over 50M, where feasible and unless otherwise agreed to by Scholastic, once 80% of the production run is complete samples will be pulled randomly from the beginning, middle and end of the production run, grouped and identified to show from which section of the production run they came from, and sent to the testing lab.
 - iii. Samples will be sent with a fully completed TRF to the lab identified on the TRF.
 - iv. Scholastic will advise in advance of production if and when 3rd party sample selection is required for a certain product. The procedure is as follows:
 - 1. Vendors may not submit samples directly to the lab. Scholastic will arrange for its approved lab to send inspectors who will select samples from production when 80% of the production run is complete.
 - 2. The lab inspectors will visit the factory to randomly select the required samples. You must notify the lab at least 3 days prior to completion of 80% of the production run to make an appointment for the factory visit.
 - 3. Samples must be properly identified, packed and either sealed with special tape, QC stamped, or signed. When possible, the lab inspectors will take these samples with them. If the inspectors are not able to take these samples with them the cartons will be sealed by or in the presence of the lab inspector and sent to lab by the factory. Samples must arrive at the lab with the seals intact. The lab will reject any sample submissions that have evidence of tampering and the vendor will be responsible for any cost incurred to submit new samples.

4. Allow enough extra time before the ship date to reach 80% of production, arrange for sample collection, ship samples to the lab, conduct testing, and receive results. We recommend the use of the 30 days prior to the first ship date to accomplish this. It is the vendor's responsibility to complete production and testing in time to make the ship date.

i. TESTING TURNAROUND TIMES:

- i. Test reports are due prior to product shipping from factory and vendors must factor this time into their manufacturing schedules in order to hold promise ship dates.
- ii. Standard turnaround time for test report results is 7-10 days from receipt of sufficient samples and approval of quote.
- iii. Some testing requires more time. Allowances will need to be made as applicable i.e. nickel release testing on metal jewelry, which is 14 days and can't be rushed.
- iv. COC will be issued to vendor as soon as test reports are received so product will be allowed to ship.

j. HOLD PROCEDURES: If the lab does not receive the proper number of samples, if sample information is incomplete or inaccurate, and/or samples are submitted without the TRF filled in correctly, the item will be put ON HOLD. Testing cannot be initiated until the missing items and/or information are provided. Upon receipt of the additional samples/information, the lab will notify Scholastic and the vendor that they are releasing the samples from HOLD. **Any delay in final product shipment due to the lack of adequate samples and/or information provided by the vendor to the lab could result in charge backs to the vendor. This includes expedited shipping costs, if needed.**

k. RETESTS:

- i. Retests due to product failures will be granted at the discretion of Scholastic. Scholastic will work with the vendor to approve a corrective action plan and the submission of new samples for testing at vendor expense if due to material or production quality fail.
- ii. Multiple retests will NOT be authorized without a clear corrective action plan to successfully address failure.
- iii. Items that fail a retest(s) after corrective actions have been exhausted will be cancelled. Any amounts prepaid for such product, if any, shall be refunded to Scholastic, together with any costs incurred by Scholastic as a result of such cancellation, including but not limited to testing charges, possible mold charges, and prepress charges, and costs associated with acquiring replacement product.
- iv. Scholastic will evaluate any product failure within 2 business days of notification and retest authorization will be determined at that time. Once an item has been approved for a retest, a new set of twelve complete packaged production samples must be supplied to the original lab with a new TRF stating the corrective action taken to rework the product and referencing the original lab test report number.
- v. If a retest is not granted, that item will be cancelled from all orders and Scholastic will not be liable for any costs incurred.
- vi. Scholastic reserves the right to cancel any item that fails to comply with the Scholastic Product Safety Protocol. Any item that fails to comply with the Protocol requirements cannot be shipped to any Scholastic location under any terms, unless vendor is able to subsequently prove compliance in accordance herewith.

l. TESTING CHARGES:

- i. Scholastic pays for testing on products where specifications and design ideas are provided by or on behalf of Scholastic and manufactured for Scholastic by its approved vendor(s)/packager(s).
- ii. Vendors whose final manufactured products fail to comply with Scholastic's product safety compliance and testing requirements, resulting in a failed test report from the lab, will be responsible for fixing/replacing the failed goods, retesting at their expense, and providing a pass report from the testing lab. If the delays created by retesting require Scholastic to expedite shipments, the vendor could be responsible for additional costs incurred, based upon a determination to be made at time of incident and review of product's full schedule details.
- iii. For outside purchases where vendors or packagers are selling their own finished product to Scholastic the packager/seller is responsible for costs related to testing and certification, providing Scholastic with the necessary COC or GCC, and having a valid test report available on request by Scholastic.

3. LETTER OF ACKNOWLEDGEMENT: A copy of this Scholastic Product Safety Protocol, together with a letter confirming your agreement to comply with this Protocol, is supplied for your review and signature. Please make sure you have reviewed, in its entirety, the Scholastic Product Safety Protocol and the accompanying letter of agreement. Please sign and date the letter where indicated to confirm your agreement with the letter and compliance with the Protocol and return the signed letter to Karen Fuchs, Director, Product Safety, Scholastic Inc., 557 Broadway, New York, NY 10012. Signed digital copy can be sent to kfuchs@scholastic.com.

4. **UNDUE INFLUENCE:** ALL ITEMS PURCHASED BY SCHOLASTIC INC. MUST COMPLY WITH ALL APPLICABLE LAWS AND REGULATIONS AND ARE SUBJECT TO THE SCHOLASTIC PRODUCT SAFETY PROTOCOL AS SET FORTH HEREIN. FURTHER, NO SCHOLASTIC EMPLOYEE OR ANY OF ITS CLIENTS, CUSTOMERS, VENDORS, OR THEIR SUPPLIERS WILL ACT IN ANY WAY THAT CREATES UNDUE INFLUENCE ON ANY TESTING LAB TO SUPPLY FALSE TEST RESULTS AND/OR FALSE REPORTS.



URGENT

**SCHOLASTIC PRODUCT SAFETY PROTOCOL
VENDOR LETTER OF ACKNOWLEDGEMENT**

July 13, 2018

To All Scholastic Vendors,

Scholastic requires all vendors to meet all applicable laws, regulations, testing standards and criteria, including any amendments, modifications or additions thereto, and any voluntary safety standards adopted by the majority of manufacturers or importers of the toy industries for non-book materials and book materials (collectively "Applicable Laws").

Additionally all vendors must comply with the Scholastic Product Safety Protocol, attached hereto.

Scholastic reserves the right to cancel all purchase orders and withhold payments on all products that do not meet these requirements.

We ask that you please confirm your agreement with the forgoing by signing this letter in the space provided below and returning it to my attention: Karen Fuchs, Director, Product Safety, Scholastic Inc., 557 Broadway, New York, NY 10012. A signed digital copy can be sent to kfuchs@scholastic.com. Please return your signed letter of acknowledgement to comply with Scholastic's Product Safety Protocol by August 13, 2018.

Thank you for your continued cooperation and support in our efforts to provide our customers with the safest product possible.

Sincerely,

Karen Fuchs
Director, Corporate Product Safety
Scholastic Inc.

Vendor Name_____

Authorized Signature_____

Name _____

Title_____

Date_____

EXHIBIT A

BILL OF SUBSTANCES FORM (BOS)

Title	
ISBN	
VENDOR	

[illegible]

EXHIBIT B

Chemicals of High Concern Declaration Letter

[INSERT LETTERHEAD HERE]

Scholastic Inc.
557 Broadway
New York, NY 10012
Attn: Karen Fuchs
Ph: 212-343-4447

Date (*DATE OF ISSUE*): MONTH/DAY/YEAR

RE: Chemicals of High Concern to Children (CHCC) Declaration

Title:
ISBN:
P.O.#:
Product Manufacture date: *month/year*
Vendor:

Mark one:

☐ Contains reportable chemicals of high concern for children. If yes, provide the following:

Component	Reportable Chemical	Concentration	State requiring reporting	Reported by vendor (Y/N)	Date Reported

☐ Does not contain reportable chemicals of high concern for children

Sign and date below and submit to ProductSafety@Scholastic.com.

Name of Issuer & Title

Signature

Date

EXHIBIT C

Toxics in Packaging Declaration Letter

[COMPANY LETTERHEAD]

Statement of Compliance with Reduction of Toxics in Packaging

We certify that all packaging and packaging components sold to Scholastic or its subsidiaries by our company or any affiliates (the "Sold Packaging") comply with

- (a) The heavy metals content requirements of the Coalition of Northeastern Governors ("CONEG") Model Toxics in Packaging legislation as enacted by various states;
- (b) The heavy metals content requirements of the California Toxics in Packaging Prevention Act, Cal. Health & Safety Code Sections 25214.11-25214.26, and
- (c) The heavy metals content requirements of the European Parliament and Council Directive 94/62/EC on Packaging and Packaging Waste ("Directive 94/62/EC"), **as applicable**.

We certify that the regulated metals – lead, mercury, cadmium, and hexavalent chromium -- were not intentionally added to any package or packaging component during the manufacturing process.

We further certify that the sum of the incidental concentration levels of lead, mercury, cadmium and hexavalent chromium present in any package or package component does not exceed 100 parts per million by weight.

No materials used to replace the heavy metals lead, mercury, cadmium or hexavalent chromium in the Sold Packaging are present in a quantity or manner that creates a hazard as great as or greater than the hazard created by the regulated metals. (Iowa Admin. Rules Section 567-213.4(445D)).

We will maintain adequate documentation of this certification for inspection upon request.

Company: _____

Certified By: _____

Company Authorized Official Only

Printed Name: _____

Title: _____

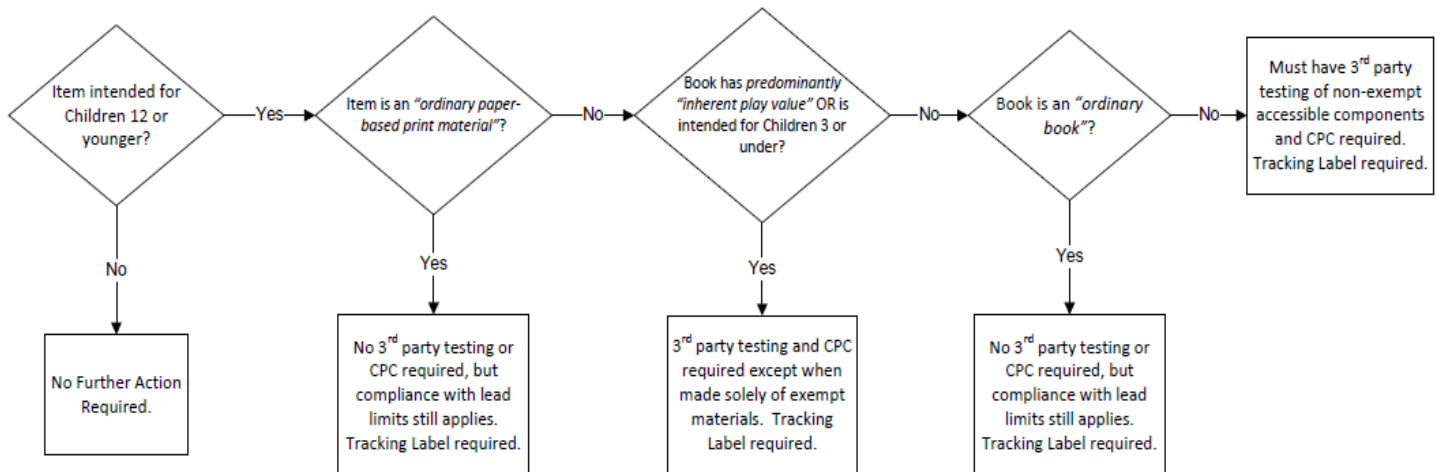
Date: __MM/DD/YYYY__

Expiration, Effective 1 Year: __MM/DD/YYYY__

EXHIBIT D

Testing Conventional Print Decision Tree

When is a CPC Required for an Ordinary Book or an Ordinary Paper-Based Item?



Definitions:

Predominant Inherent Play Value – a book that, by its design or components, is intended to be interactive in the same manner as a toy.

Ordinary Book - The term 'ordinary book' means a book printed on paper or cardboard, printed with inks or toners, and 'bound and finished using a conventional method,' and that is intended to be read or has educational value. Such term does not include books with predominant inherent play value, books designed or intended for a child 3 years of age or younger, and does not include any toy or other article that is not a book that is sold or packaged with an ordinary book. In addition, the term 'ordinary book' does not include books that contain components that are printed on material other than paper or cardboard or contain non-paper based components such as metal or plastic parts or accessories that are not part of the 'binding and finishing materials used in a conventional method.'

Ordinary Paper-Based Printed Material - The term 'ordinary paper-based printed materials' means materials printed on paper or cardboard, such as magazines, posters, greeting cards, and similar products, that are printed with inks or toners and 'bound and finished using a conventional method.' Such terms do not include printed materials that contain components that are printed on material other than paper or cardboard or contain non-paper based components such as metal or plastic parts or accessories that are not part of the 'binding and finishing materials used in a conventional method.'

Binding and Finishing in a Conventional Manner - The manufacturing processes that occurs after printing with a press has been performed on a substrate such as paper or cardboard with finishing typically being performed prior to binding. Binding involves the joining of assembled sheets into a final product and finishing imparts special features both of which are accomplished through a variety of methods and techniques. Binding methods involve mechanical and/or adhesive techniques and include, but are not limited to, sewing with thread, perfect binding with adhesives, coated or uncoated plastic and metal coil/spiral binding, saddle-stitching, spine-see, and drilling for individual or three-ring loose leaf applications. Finishing methods involve mechanical and other treatments and include, but are not limited to cutting, folding, trimming, drilling, rounding corners, die cutting, embossing, debossing, gilding and/or staining, glittering, coatings, laminating, numbering, addressing, and foil stamping.

Accessible Components - A component is accessible if it is not enclosed in a sealed covering and is exposed through reasonably foreseeable use or abuse. The types of use and abuse that are reasonably foreseeable include swallowing, mouthing, breaking and aging. Use and abuse tests and accessibility probes are used to determine whether a part is accessible or inaccessible. Paint, coatings or electroplating do not provide barriers that would result in a part being inaccessible.

Rev. Date: 03/05/12

EXHIBIT E

NCMP LOA-Material Change Declaration

LOA MUST BE ON OFFICIAL LETTERHEAD OF COMPANY ISSUING LETTER OF ASSURANCE

Scholastic Inc.
557 Broadway
New York, NY 10012
Attn: Karen Fuchs
Ph: 212-343-4447

Date:

RE: Letter of Assurance Certifying No Change in Manufacturing Process

Title:
ISBN:
P.O. #:
Product Manufacture date:

We hereby certify that nothing in the manufacturing process, including raw materials and raw material suppliers, ingredients and ingredient formulations, for the above order, has changed from the last tested samples certified compliant to all current applicable standards per the following test report(s) and/or safety documents (Lhama, TRA, USP, etc.):

(List any test report/safety documents, including issuing lab and report date, being used to certify compliance of above ordered product to all applicable standard. Test reports must be current within 1 year of current order. Documents like Lhama, TRA, and USP, when applicable, are good for 3 -5 years.)

Lab (Name & Location):
Report #:
Report Issue Date:
ISBN tested:

If testing provided reflects ASTM F963-11 you must certify in writing it also meets all applicable modifications noted in ASTM F963-16 or that this product is not subject to any change in regulation under ASTM F963-16.

Copies of above listed documents attached.

Name of Issuer & Title

Signature

Date

EXHIBIT F

SCHOLASTIC TEST REQUEST FORM (TRF)

SCHOLASTIC TEST REQUEST FORM TEMPLATE

Test Lab

Date: November 28, 2016

Lab

UL Hong Kong

UL Hong Kong
16-17F, Tower B, Regent Centre, 63 Wo Yi Hop Road
Kwai Chung, Hong Kong
Attn: Carrie Wong
Carrie.wong@ul.com

Client Information

Division ☐ Book Clubs

☐ Klutz

☐ Education/Magazines

☐ Tangerine Press

☐ Other: _____

☐ Trade

Charge Code: _____

Company Name: Scholastic Inc.

Address: 557 Broadway

Contact: _____

City/State/Zip: New York, NY 10012

Phone: _____

Country: USA

Email: _____

Vendor Information

Vendor Name: _____

Contact: _____

Address: _____

Phone: _____

City/State/Zip: _____

Fax: _____

Country: _____

Email: _____

Factory Information

☐

Check if same as Vendor

Vendor Name: _____

Contact: _____

Address: _____

Phone: _____

City/State/Zip: _____

Fax: _____

Country: _____

Email: _____

Quote, Report, and Invoice Recipient (s)

Primary for approval

Contact: _____

Email: _____

CC:

Contact: Karen Fuchs

Email: kfuchs@scholastic.com

Contact: _____

Email: _____

Contact: _____

Email: _____

Contact: _____

Email: _____

Bill To:

☒ Client

☐ Vendor

☐ Factory

ALL QUOTES MUST HAVE A QUOTE #. TITLE, ISBN, DIVISION, CLIENT NAME, QUOTE # AND CHARGE CODE MUST BE INCLUDED ON ALL INVOICES OR THEY WILL BE REJECTED.

Service Information

☐ 1 Working Day (Rush)*

☐ 2 Working Days (Rush)*

☐ 3 Working Days (Rush)*

☒ 5-7 Days

*Rush charges may not apply per special Lab price agreement with Scholastic

Sample Information

Product Title: _____

ISBN/ITEM#: _____

Description: _____

Scholastic PO: _____

Country-of-Origin: _____ Tracking#: _____

Date of Mfg: _____

Age Grading for Tests: _____

Number of Samples: _____

Submission Type: ☐ Preproduction Samples

☐ COC Component Samples

☐ COC Finished Kit Samples

Re-test: ☐ Yes ☐ No

If yes, test report #: _____

FYI, Previous orders tested: ☐ Yes ☐ No

If yes, previous report # for reference: _____

Review Services

- ☐ Design Hazard Risk Assessment: ☐ Email Summary (\$1300) ☐ Hard copy summary (\$2500) **TAT: 10 days** **Samples: 15**
- ☐ Product Review: ☐ US ☐ Canada ☐ EU ☐ AUS/NZ ☐ Other: _____ **TAT: 5-7 days** **Cost: \$300**
- ☐ Cosmetic Label Review: ☐ US ☐ Canada ☐ EU ☐ AUS/NZ ☐ Other: _____

Test Program

Client Recommends Testing as: ☐ Toy ☒ Children's Product ☐ General Consumer Product

☒ Lab to Consult and Advise

Test Countries

☐ USA

- ☐ Total Lead in Substrate (CPSC-CH-E1001-08.3, CPSC-CH-E1002-08.3)
- ☐ Lead in Paint or Surface Coating (CPSC-CH-E1003-09.1)
- ☐ Phthalates [6] (CPSC-CH-C1001-09.3)
- ☐ Tracking Label Evaluation (CPSIA Public Law 110-314)
- ☐ CA Prop 65 ☐ Phthalates (7) ☐ Lead

- ☐ ASTM F963-11.4, 16 CFR 1500 Physical and Mechanical Test
- ☐ ASTM F963-11.4.2, 16 CFR 1500.44 Flammability of Solid
- ☐ ASTM F963-11.4.2, 16 CFR 1610 Flammability of Clothing Textile
- ☐ ASTM F963-11.4.3, 16 CFR 1303, IL (40ppm) Total Lead Surface Coating
- ☐ ASTM F963-11.4.3 Total Lead Substrate
- ☐ ASTM F963-11.4.3 Soluble Heavy Metal Content (8 Elements)
- ☐ ASTM F963-11.4.3 Soluble Cadmium
- ☐ Bacteriological Tests ☐ USP 61/62 ☐ USP51
- ☐ ASTM F963-11.4.25 Battery Operated Test (need circuit diagram)
- ☐ PA 47.317 Regulations, PA Stuffing Cleanliness Test
- ☐ AATCC 107 20128, DIN 53160-1, Colorfastness Water/Saliva
- ☐ 21 CFR 170-190 (FDA) Food Contacting Articles
- ☐ TPCH [CONEG] (Toxics in Packaging Clearing House)

☐ Canada Toys Regulations (SOR/2011-17)

- ☐ EXCLUDE QUEBEC
- ☐ SOR/2011-22 Textiles Flammability Regulations
- ☐ SOR/2011-22 Textiles Flammability Regulations
- ☐ SOR/2005-109 Surface Coating Materials Regulation
- ☐ SOR/2010-298 Phthalates Regulations
- ☐ SOR/2011-19 Children's Jewelry Regulations
- ☐ SOR 2011-17.7 Physical and Mechanical Test
- ☐ SOR 2011-17.7 Physical and Mechanical Test

☐ Japan Food Sanitation Law

☐ Japan Toy Safety Standard (ST Standard)

- ☐ Part 1 Physical and Mechanical Test
- ☐ Part 2 Flammability Test
- ☐ Part 3 Chemical Properties Test

☐ Australia/New Zealand

- ☐ AUNZ ISO 8124.1 Physical and Mechanical
- ☐ AUNZ ISO 8124.2 Flammability Test
- ☐ AUNZ ISO 8124.3 Migration of Toxic Elements
- ☐ AS 62115 Electric Toy Safety

☐ Europe - Toy Safety Directive

- ☐ EN71 Part 1 Physical and Mechanical Test
- ☐ EN71 Part 2 Flammability Test
- ☐ EN71 Part 3 Migration of Toxic Elements Test
- ☐ EN71 Part 4 Experimental Set for Chemistry
- ☐ EN71 Part 5 Chemical Toy Sets
- ☐ EN71 Part 6 Graphical Symbol for Age Warning Label
- ☐ EN71 Part 7 Finger Paints
- ☐ EN71 Part 8 Activity Toys for Domestic Use
- ☐ EN71 Part 9 Organic Chemical Compounds
- ☐ EN71 Part 12 Nitrosamines and Nitrosatiabiles
- ☐ EN62115 Electric Toy Safety (need circuit diagram)

☐ Additional Europe Requirements

- ☐ EN62115 Electric Toy Safety (need circuit diagram)
- ☐ Cadmium Content (REACH Annex XVII)
- ☐ Food Contact Articles (Directive 10/2011/EC)
- ☐ Chromium VI (REACH Annex XVII)
- ☐ Lead Content (REACH Annex XVII)
- ☐ PAHS (REACH Annex XVII)
- ☐ Phthalates (REACH Annex XVII)
- ☐ Nickel Release (REACH Annex XVII)
- ☐ RoHS 2.0 (Directive 2011/65/EU)
- ☐ Benzene (82/806/EEC)
- ☐ Organotin (2009-425/EC)
- ☐ Packaging Materials Test (Directive 94/62/EC)
- ☐ Nonylphenol Ethoxylates (REACH Annex XVII)

☐ Others

- ☐ Formaldehyde ☐ BPA ☐ Formamide
- ☐ Phenol ☐ SVHCs ☐ TCEP, TCPP, TDCP

Notes:

COC Components Testing on Hand

Component/Component ID#:	Existing Lab Report#:
Component/Component ID#:	Existing Lab Report#:
Component/Component ID#:	Existing Lab Report#:
Component/Component ID#:	Existing Lab Report#:
Component/Component ID#:	Existing Lab Report#:
Component/Component ID#:	Existing Lab Report#:

Authorized Signature

Signature:	Print Name:	Karen Fuchs
Company: Scholastic	Title: Director of Product Safety	Date:

Sample Image

Insert Image (Required)

EXHIBIT G

CERTIFICATE OF COMPLIANCE (COC)

<p style="color: blue; margin: 0;">CERTIFICATION OF COMPLIANCE</p> <p style="color: blue; margin: 0;">IN COMPLIANCE WITH U.S. CPSIA 2008, SECTION 102</p>		<p style="color: blue; margin: 0;">COC Date: 07-Oct-14</p>	
1. Product covered by this certificate			
Product Name:			
Item No:			
PO No:		Ages:	
Description:			
Tracking No:			
2. Applicable product safety standard(s) or regulation(s), if any, to which this product is being certified:			
3. U.S. importer or U.S. manufacturer certifying compliance of this product:			
Company Name:			
Address:			
City/State/Province/Zip:			
Phone:			
4. Contact information for the individual maintaining records of test results for this product:			
Company Name:			
Contact:			
Address:			
City/State/Province/Zip:			
Phone:			
Email:			
5. Date and place where this product was manufactured:			
Manufacture City/Country:			
Month of Manufacture:			
6. Third-party testing laboratory on whose the certificate depends:			
Testing Lab Name:			
Address:			
City:			
State/Province/Zip:		Zip:	
Test Report Date:			
Test Report No.:			

EXHIBIT H

SCHOLASTIC REQUEST FOR TRF (SUBR)



SUBMITTAL REQUEST FOR TESTING

Fill out all fields below and send to ProductSafety@Scholastic.com

VENDOR:
VENDOR CONTACT NAME:
VENDOR EMAIL:
DATE:

RE: REQUEST FOR LAB TEST REQUEST FORM

- 1. INCLUDE CLEAR IMAGE/IMAGES OF SAMPLES AND ANY RETAIL PACKAGING AND LABELING WITH ANY SUBMITTAL REQUEST FOR TESTING.**
- 2. SUBMITTAL REQUEST FOR TESTING SHOULD BE SUBMITTED AT LEAST 10 DAYS PRIOR TO SAMPLES BEING READY TO RELEASE TO LAB.**
- 3. ALL SUBMITTAL FORMS ARE TO BE EMAILED TO THE SCHOLASTIC EMAIL ADDRESS NOTED ABOVE. SUBJECT LINE OF EMAIL SHOULD IDENTIFY SCHOLASTIC BUSINESS FIRST, FOLLOWED BY SUBR_TITLE_VENDOR__DATE".**

The following sample(s) are being prepared to submit for testing and require a completed Test Request Form (TRF) from Scholastic:

TITLE			
PARENT ISBN			
P.O.#			
PRINTLINE/TRACK#			
VENDOR FACTORY	NAME:		
	ADDRESS:		
	CITY:		
	COUNTRY:		
VENDOR LAB LOCATION PREFERENCE	<input type="checkbox"/> Hong Kong <input type="checkbox"/> Shanghai <input type="checkbox"/> Shenzen <input type="checkbox"/> Taiwan <input type="checkbox"/> USA		
PRODUCT/SAMPLE DESCRIPTION			
SAMPLE TYPE	<input type="checkbox"/> Pre-Production	<input type="checkbox"/> COC Component	<input type="checkbox"/> COC Final Product
	<input type="checkbox"/> For quoting and sample qty confirmation only		
MO/YR OF MANUFACTURE			
SAMPLE READY DATE			
PROMISE SHIP DATE			